



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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January 26, 2023

**BY ECF**

Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Joseph Srour v. City of New York, et. al.,  
22-CV-0003 (JPC)

Your Honor:

I am the Assistant Corporation Counsel assigned to represent defendants City of New York and New York City Police Department (“NYPD”) Commissioner Keechant Sewell in the above-referenced matter. I write, with the consent of plaintiff’s counsel, to respectfully request that defendants be granted a 3 week enlargement of time, from January 31, 2023 until February 21, 2023, to file their opposition to plaintiff’s motion for summary judgment. This is defendants’ first application for an extension of time to file the opposition.

Briefly, plaintiff brings facial challenges under the Second Amendment to certain provisions of the Rules of the City of New York regulating the review of applications for rifle/shotgun permits and handgun permits for possession within the home. By Order dated November 3, 2022, Your Honor set a briefing schedule for plaintiff’s motion for summary judgment. Plaintiff filed the motion on December 16, 2022. Defendants’ opposition papers are currently due January 31, 2023, and the reply papers are due February 14, 2023.

The requested enlargement of time is necessary due to several unexpected and time-consuming responsibilities that arose on short notice in several of my other cases at the end of December. Further, I was out of the office on a long-planned vacation from December 23<sup>rd</sup> until January 6<sup>th</sup>. As a result, I was required to spend the time I had planned to devote to writing the opposition in this action following the holidays on other matters. Accordingly, defendants respectfully request an enlargement of time, until February 21, 2023, to file the opposition papers, and a corresponding amount of time, until March 7, 2023, for plaintiff to reply. Plaintiff consents to this request.

I thank the Court for its consideration of this request.

Respectfully submitted,

/S  
Aimee K. Lulich  
Senior Counsel

cc: Amy Bellantoni, Esq. (By ECF)